

MERRICK, LOUISON & COSTELLO, LLP

ATTORNEYS AT LAW

67 BATTERYMARCH STREET
BOSTON, MASSACHUSETTS 02110

TELEPHONE: (617) 439-0305

FACSIMILE: (617) 439-0325

www.inerricklc.com

December 10, 2004

Via Fax (215) 665-2013

A. Richard Bailey
Cozen & O'Connor
1900 Market Street
Philadelphia, PA 19103-3508

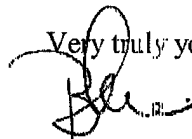
Re: Great Northern Ins. Co. as subrogee of Phyllis MacNeil v. Intercity Alarms, Inc.
U.S. District Court C.A. No: 03CV12463RGS

Dear Mr. Bailey:

With regards to your continued persistence in obtaining further responses to the plaintiff's admission of fact I stand by response in my letter to you dated May 3, 2004 and continue to take the position that the admissions were beyond the scope of admissions in that you asked employees of the defendant Intercity Alarms, Inc. to admit or deny under the pain of perjury certain facts for which have no personal knowledge specifically but not limited to what other witnesses observed or saw at the fire.

With regards to my motion for partial summary judgment, you requested me to send you cases supporting our defense under the Statute of Repose. I would prefer to wait until you receive the memorandum of law which should contain cases to support my position.

Very truly yours,



Bradford N. Louison

BNL/mob